

Fill in this information to identify the case:Debtor 1 RAYMOND C. LEWISDebtor 2 VERNA LEWIS
(Spouse, if filing)United States Bankruptcy Court for the: Middle District of PennsylvaniaCase number 5:18-bk-00102-MJC

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information**Name of Creditor:** Deutsche Bank National Trust Company, as Trustee for Argent Securities Inc., Asset-Backed Pass-Through Certificates, Series 2004-W3**Court claim no. (if known):**
19**Last 4 digits** of any number you use to identify the debtor's account: 3996**Property address:** 127 Knob Ln
Number Street
Shawnee on Delaware, PA 18356
City State ZIP Code**Part 2: Prepetition Default Payments**

Check one:

- ☐ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☒ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

****Per the order on the 3rd modified plan, POC arrears will not be paid during the Bankruptcy but will be recoverable post BK****\$ 2,204.45**Part 3: Postpetition Mortgage Payment**

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: _____
MM/DD/YYYY

- ☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: 3/1/23 payment 1588.69+4/1/23 1588.69+ 5/1/23 1588.69+ 6/1/2023 1588.69- (440.62) suspense (a) \$ 6,314.14b. Total fees, charges, expenses, escrow, and costs outstanding: +(b) \$ 0.00c. **Total.** Add lines a and b.(c) \$ 6,314.14

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

03/01/2023
MM/DD/YYYY

Debtor1 RAYMOND C. LEWIS
First Middle Last

Case number (if known) 5:18-bk-00102-MJC

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x /s/Mario Hanyon Date 06/14/2023
Signature

Print Mario Hanyon Title Attorney
First Name Middle Name Last Name

Company Brock & Scott, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 3825 Forrestgate Dr.
Number Street
Winston-Salem, NC 27103
City State ZIP Code

Contact phone 844-856-6646 Email PABKR@brockandscott.com

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**
Wilkes-Barre Division

IN RE:
RAYMOND C. LEWIS AND VERA LEWIS

Deutsche Bank National Trust Company, as Trustee
for Argent Securities Inc., Asset-Backed Pass-
Through Certificates, Series 2004-W3,
Movant

vs.

RAYMOND C. LEWIS AND VERA LEWIS,
Debtors

Case No. 5:18-bk-00102-MJC
Chapter 13

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the foregoing Response to Notice of Final Cure Payment has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

Patrick James Best, Debtor's Attorney
18 North 8th Street
Stroudsburg, PA 18360
patrick@armlawyers.com

Jack N Zaharopoulos, Bankruptcy Trustee
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

United States Trustee, US Trustee
228 Walnut Street, Suite 1190
Harrisburg, PA 17101

Via First Class Mail:

RAYMOND C. LEWIS
P.O. BOX 387
SHAWNEE ON DELAWARE, PA 18356-0387

VERNA LEWIS
P.O. BOX 387
SHAWNEE ON DELAWARE, PA 18356-0387

Date: June 14, 2023

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Matt Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

BROCK & SCOTT, PLLC

3825 Forrestgate Drive

Winston Salem, NC 27103

Telephone: (844) 856-6646

Facsimile: (704) 369-0760

E-Mail: PABKR@brockandscott.com

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

:
:
:
:
:
:

Chapter 13

Raymond C. Lewis,
Verna Lewis,
Debtors.

Case No. 5:18-bk-00102-MJC

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**ORDER APPROVING MOTION TO MODIFY
CONFIRMED CHAPTER 13 PLAN**

Upon consideration of the Motion to Modify Confirmed Chapter 13 Plan filed on March 15, 2023, Dkt. #66 ("Motion"), and the Debtors having certified that Notice was sent to all creditors and parties in interest entitled to receive notice, it is hereby **ORDERED** that the Motion is **GRANTED** and the Debtors' Amended Plan filed in conjunction with the Motion is hereby approved and shall be **ADOPTED** as the Confirmed Chapter 13 Plan, as Modified.

By the Court,



Mark J. Conway, Bankruptcy Judge
Dated: May 5, 2023

Notice Recipients

District/Off: 0314-5
Case: 5:18-bk-00102-MJC

User: AutoDocketer
Form ID: pdf010

Date Created: 5/5/2023
Total: 1

Recipients of Notice of Electronic Filing:
aty Patrick James Best patrick@armlawyers.com

TOTAL: 1

Name:		pre & post			
BK Case Number:					
Filing Date:					
Post-Petition Due	Date Received	Amount Received	Amount Applied	Suspense Application	Suspense Balance
					\$0.00
1/1/2018	2/7/2018	1,529.00	\$1,410.68	\$118.32	\$118.32
2/1/2018	3/14/2018	1,600.00	\$1,410.68	\$189.32	\$307.64
3/1/2018	3/22/2018	1,500.00	\$1,410.68	\$89.32	\$396.96
4/1/2018	5/15/2018	1,487.00	\$1,410.68	\$76.32	\$473.28
5/1/2018	7/10/2018	960	\$1,410.68	-\$450.68	\$22.60
6/1/2018	9/6/2018	1,410.68	\$1,410.68	\$0.00	\$22.60
7/1/2018	10/17/2018	1,447.46	\$1,410.68	\$36.78	\$59.38
8/1/2018	11/15/2018	1,410.68	\$1,410.68	\$0.00	\$59.38
9/1/2018	1/10/2019	1,447.64	\$1,410.68	\$36.96	\$96.34
10/1/2018	4/5/2019	6,000.00	\$1,447.46	\$4,552.54	\$4,648.88
11/1/2018			\$1,447.46	-\$1,447.46	\$3,201.42
12/1/2018			\$1,447.64	-\$1,447.64	\$1,753.78
1/1/2019			\$1,447.64	-\$1,447.64	\$306.14
2/1/2019	5/13/2019	1,500.00	\$1,447.64	\$52.36	\$358.50
	5/22/2019	500		\$500.00	\$858.50
3/1/2019	7/12/2019	1495.00	\$1,447.64	\$47.36	\$905.86
4/1/2019	7/15/2019	1447.64	\$1,447.64	\$0.00	\$905.86
5/1/2019	8/20/2019	1447.64	\$1,447.64	\$0.00	\$905.86
6/1/2019	9/12/2019	1447.64	\$1,447.64	\$0.00	\$905.86
7/1/2019	10/10/2019	1447.64	\$1,447.64	\$0.00	\$905.86
escrow	11/19/2019	24.99	\$24.99	\$0.00	\$905.86
8/1/2019	11/21/2019	1447.64	\$1,447.64	\$0.00	\$905.86
9/1/2019	12/12/2019	1447.64	\$1,447.64	\$0.00	\$905.86
	1/27/2020	16.76		\$16.76	\$922.62
10/1/2019	1/30/2020	1447.64	\$1,486.81	-\$39.17	\$883.45
11/1/2019	2/10/2020	1486.81	\$1,486.81	\$0.00	\$883.45
12/1/2019	3/18/2020	1486.81	\$1,486.81	\$0.00	\$883.45
	3/19/2020	33.50		\$33.50	\$916.95
1/1/2020	4/15/2020	1486.81	\$1,486.81	\$0.00	\$916.95

	4/20/2020	16.75		\$16.75	\$933.70
	5/14/2020	16.17		\$16.17	\$949.87
2/1/2020	5/26/2020	1486.81	\$1,486.81	\$0.00	\$949.87
3/1/2020	6/24/2020	1486.81	\$1,486.81	\$0.00	\$949.87
4/1/2020	7/15/2020	1486.81	\$1,486.81	\$0.00	\$949.87
5/1/2020	8/19/2020	1486.81	\$1,486.81	\$0.00	\$949.87
6/1/2020	9/16/2020	1486.81	\$1,486.81	\$0.00	\$949.87
	9/24/2020	32.32		\$32.32	\$982.19
7/1/2020	10/15/2020	1486.81	\$1,486.81	\$0.00	\$982.19
	10/23/2020	16.16		\$16.16	\$998.35
	11/16/2020	16.15		\$16.15	\$1,014.50
8/1/2020	11/18/2020	1486.81	\$1,486.81	\$0.00	\$1,014.50
	12/16/2020	16.34		\$16.34	\$1,030.84
9/1/2020	12/21/2020	1486.81	\$1,486.81	\$0.00	\$1,030.84
10/1/2020	1/28/2021	1486.81	\$ 1,550.60	-\$63.79	\$967.05
	2/1/2021	63.79		\$63.79	\$1,030.84
	2/1/2021	56.51		\$56.51	\$1,087.35
11/01/20	2/23/2021	1550.60	\$ 1,550.60	\$0.00	\$1,087.35
	2/25/2021	16.34		\$16.34	\$1,103.69
12/01/20	3/15/2021	1550.60	\$ 1,550.60	\$0.00	\$1,103.69
	3/26/2021	16.35		\$16.35	\$1,120.04
01/01/21	4/9/2021	1550.60	\$ 1,550.60	\$0.00	\$1,120.04
	4/23/2021	16.33		\$16.33	\$1,136.37
02/01/21	5/7/2021	1550.60	\$ 1,550.60	\$0.00	\$1,136.37
	5/28/2021	16.34		\$16.34	\$1,152.71
03/01/21	6/10/2021	1550.60	\$ 1,550.60	\$0.00	\$1,152.71
	6/25/2021	16.87		\$16.87	\$1,169.58
04/01/21	7/9/2021	1550.60	\$ 1,550.60	\$0.00	\$1,169.58
	7/21/2021	16.89		\$16.89	\$1,186.47
05/01/21	8/11/2021	1550.60	\$ 1,550.60	\$0.00	\$1,186.47
	8/24/2021	16.87		\$16.87	\$1,203.34
06/01/21	9/9/2021	1550.60	\$ 1,550.60	\$0.00	\$1,203.34
	9/24/2021	16.87		\$16.87	\$1,220.21
07/01/21	10/14/2021	1550.60	\$ 1,550.60	\$0.00	\$1,220.21

	10/22/2021	16.89		\$16.89	\$1,237.10
08/01/21	11/23/2021	1550.60	\$ 1,550.60	\$0.00	\$1,237.10
	11/24/2021	16.39		\$16.39	\$1,253.49
09/01/21	12/14/2021	1550.60	\$ 1,550.60	\$0.00	\$1,253.49
	12/22/2021	16.39		\$16.39	\$1,269.88
10/01/21	1/21/2022	1549.00	\$ 1,548.56	\$0.44	\$1,270.32
	1/26/2022	16.40		\$16.40	\$1,286.72
11/01/21	2/10/2022	1548.56	\$ 1,548.56	\$0.00	\$1,286.72
	2/24/2022	16.39		\$16.39	\$1,303.11
12/01/21	3/11/2022	1548.56	\$ 1,548.56	\$0.00	\$1,303.11
	4/19/2022	16.39		\$16.39	\$1,319.50
01/01/22	4/21/2022	1548.56	\$ 1,548.56	\$0.00	\$1,319.50
02/01/22	5/13/2022	1548.56	\$ 1,548.56	\$0.00	\$1,319.50
	5/23/2022	16.39		\$16.39	\$1,335.89
03/01/22	6/14/2022	1548.56	\$ 1,548.56	\$0.00	\$1,335.89
	6/21/2022	16.40		\$16.40	\$1,352.29
04/01/22	7/8/2022	1548.56	\$ 1,548.56	\$0.00	\$1,352.29
	7/21/2022	16.39		\$16.39	\$1,368.68
05/01/22	8/16/2022	1548.56	\$ 1,548.56	\$0.00	\$1,368.68
	8/24/2022	17.61		\$17.61	\$1,386.29
06/01/22	9/14/2022	1548.56	\$ 1,548.56	\$0.00	\$1,386.29
	9/21/2022	17.62		\$17.62	\$1,403.91
07/01/22	10/13/2022	1548.56	\$ 1,548.56	\$0.00	\$1,403.91
	11/1/2022	17.61		\$17.61	\$1,421.52
08/01/22	11/15/2022	1548.56	\$ 1,548.56	\$0.00	\$1,421.52
09/01/22	12/13/2022	1548.56	\$ 1,548.56	\$0.00	\$1,421.52
	12/14/2022	16.70		\$16.70	\$1,438.22
10/01/22	1/19/2023	1588.69	\$ 1,588.69	\$0.00	\$1,438.22
	1/30/2023	16.70		\$16.70	\$1,454.92
11/01/22	2/14/2023	1588.69	\$ 1,588.69	\$0.00	\$1,454.92
	3/3/2023	16.70		\$16.70	\$1,471.62
12/01/22	3/13/2023	1588.69	\$ 1,588.69	\$0.00	\$1,471.62
01/01/23	5/8/2023	1588.69	\$ 1,588.69	\$0.00	\$1,471.62
02/01/23	5/23/2023	1588.69	\$ 1,588.69	\$0.00	\$1,471.62

mfr atty fees/costs			\$ 1,031.00	-\$1,031.00	\$440.62
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Post petition due	
3/1/2023	\$1,588.69
4/1/2023	\$1,588.69
5/1/2023	\$1,588.69
6/1/2023	\$1,588.69